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June 4, 2013

Via ECF Filing

Hon. Dora L. Irizarry
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Lester Zaborski
Docket No.: S1 11 Cr. 486 (DLI)

Dear Judge Irizarry:

I was appointed to represent Lester Zaborski in the above-referenced matter. I am writing to request a modification to Mr. Zaborski's bail conditions so as to allow him to do the following:

1. Mr. Zaborski would like to visit his mother on Saturday, June 8th. His mother is a resident at Leeway, a nursing home in New Haven Ct. Mr. Zaborski has not seen his mother since the Christmas holidays when the Court granted permission for him to visit her. His mother has a complicated medical history and is unable to leave the nursing home. Mr. Zaborski would like to visit her this Saturday, June 8th. The nursing home is about an hour and one-half drive from his home. He would like permission to leave his home about 10:00 a.m. and return to his home by 6:00 p.m.
2. Mr. Zaborski would like to spend Father's Day, June 16, 2013 at the home of Nicole March, Mr. Zaborski's sister-in-law. Mrs. March, with her family, resides at 809 Vincent Avenue, Bronx, N.Y. 10465, telephone number 646-533-1271. In order to allow Mr. Zaborski time to travel from his home and then back, it is requested that Mr. Zaborski be allowed to leave his home at 12:00 noon and to return by 10:00 p.m.

Hon. Dora L. Irizarry

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June 4, 2013

I have communicated each of these two requests to AUSA Parlovecchio and am authorized to represent that the Government does not object to any of these requests.

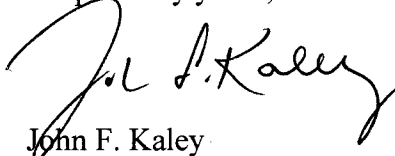
I have communicated via email with Pre-trial Services regarding each of these requests and represent that Pre-trial Services does not object to each of these requests per the e-mail correspondence attached.

On August 23, 2011 (Docket Entries #'s 273 and 274), Mr. Zaborski was released on bail in this matter. The bail conditions set principally were the following: a \$300,000 PRB co-signed by four financially responsible persons, home detention with electric monitoring, with drug testing and treatment. Since his release and the commencement of supervision by the Pre-trial Services Agency, Mr. Zaborski has complied with all conditions. All treatment sessions have been attended and all tests for the presence of illegal substances have been negative.

The Court has granted prior requests to modify Mr. Zaborski's bail conditions and that was to allow him to attend certain family functions and to begin employment. Mr. Zaborski has dutifully complied with all conditions and has done quite well. We respectfully ask that Your Honor grant this bail modification as requested so that Mr. Zaborski may visit his mother, and spend Father's Day with his wife's sister and family.

Thank you for your consideration of these requests.

Respectfully yours,

A handwritten signature in black ink, appearing to read "John F. Kaley". The signature is fluid and cursive, with the first name "John" and last name "Kaley" clearly distinguishable.

John F. Kaley

cc: AUSA Gina Parlovecchio(via e-mail and ECF Filing)
U.S. Pre-trial Services Officer Michael Alaria
(via email to emunit@nyept.uscourts.gov and ECF Filing)

John Kaley

From: Melissa_Siberon@nyept.uscourts.gov on behalf of emunit@nyept.uscourts.gov
Sent: Tuesday, June 04, 2013 2:19 PM
To: John Kaley
Cc: emunit@nyept.uscourts.gov; gina.parlovecchio@usdoj.gov;
Michael_Ilaria@nyept.uscourts.gov; steven.tiscione@usdoj.gov
Subject: Re: Lester Zaborski

Hello,

Officer Ilaria has no objection. Please forward the court order once it is received.

Thank you.

The Location Monitoring Unit
Tel#: 718-613-2378
Fax#: 718-613-2488

From: John Kaley <jkaley@doarlaw.com>
To: "emunit@nyept.uscourts.gov" <emunit@nyept.uscourts.gov>,
"steven.tiscione@usdoj.gov" <steven.tiscione@usdoj.gov>,
"gina.parlovecchio@usdoj.gov" <gina.parlovecchio@usdoj.gov>,
"Michael_Ilaria@nyept.uscourts.gov"
<Michael_Ilaria@nyept.uscourts.gov>
Cc: John Kaley <jkaley@doarlaw.com>
Date: 06/04/2013 01:34 PM
Subject: Lester Zaborski

Dear Mr. Alaria:

I represent Lester Zaborski. Mr. Zaborski is on home detention.

I am writing to request permission for the following:

1. Mr. Zaborski would like to visit his mother on Saturday, June 8th. His mother is a resident at Leeway, a nursing home in New Haven CT. Mr. Zaborski has not seen his mother since the Christmas holidays. She has a complicated medical history and is unable to leave the nursing home. Mr. Zaborski would like to visit her this Saturday, June 8th. The nursing home is about an hour and one-half drive from his home. He would like permission to leave his home at 10:00 a.m. and return to his home by 6:00p.m.

2. Mr. Zaborski and his family would like to spend Father's Day with his wife's sister's family. Father's Day is Sunday, June 15th. Mr. Zaborski requests that he be permitted to leave his home at noon time and return by 10:00p.m. Ms. March (his sister-in-law) and her family reside at 809 Vincent Avenue, Bronx, NY, telephone # 646-533-1271

Once I receive the position of Pre-trial and AUSA Tiscione, I will submit a formal request to Judge Irizarry. Your prompt reply would make up for my lateness in sending this email.

Thank you for your consideration of this request.

Regards,

John Kaley

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(212) 619-3730